



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

July 22, 2011

Joe Escoto
Superintendent, Padre
Island National Seashore
National Park Service
P.O. Box 181300
Corpus Christi, TX 78480-1300

SUBJECT: Beach Vehicle Draft Environmental Assessment

Dear Mr. Escoto:

The Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Assessment (DEA) prepared by the National Park Service. In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas is providing the following comments regarding the DEA.

Purpose of and Need for Action, page 5

Include the discussion of why 4WD vehicles are needed on South Beach (similar to page 54). The reader will be aware earlier in the document what the relation is between rise in 4WD vehicles on the seashore and associated impacts of increased use.

Impact Topics Dismissed from Further Analysis, Water Resources, page 16

The Water Resources section speaks only to water quality impacts. Water resources is a very broad topic and this paragraph would be more properly characterized as Water Quality.

The statement "Seashore staff have not reported impacts on water quality related to beach driving" seems to refer to anecdotal evidence or opinion that because impacts have not been reported, there aren't any. The section should cite water quality or monitoring studies that support the statement that there are no impacts to water quality. There are water sampling locations (EPA and USGS) in the nearby Laguna Madre, but not on the Gulf side of the Seashore beach driving areas.

In reference to impacts on water quality, this section states that "...sand is not generally suspended in the water column," but there could be other impacts to water quality other than sand movement, such as leaked oil from vehicles or leaked waste from recreational vehicles. In general, the section should more fully address the issue of water quality before concluding that no further analysis is needed.

Impact Topics Dismissed from Further Analysis, Wetlands, page 17

This section notes that "the Gulf beach is considered a wetland and the...project is located within these areas," but there is no wetland delineation which would quantify the impacts to wetland areas which are protected under Executive Order 11990 and Section 404 of the Clean Water Act. Without a wetland delineation and an overlay map, the EA does not present enough information to judge whether or not wetlands would be impacted. The U.S. Fish & Wildlife Service's National Wetlands Inventory map of the Seashore shows the presence of wetlands in the area, including freshwater emergent, and estuarine and marine, and marine deepwater types.

The EA states "Beach driving in long-established routes would continue, and vegetation is generally not present in the driving zone." When vegetation is present within the driving zone, that vegetation should be assessed in more detail. Some of that vegetation may be wetlands vegetation.

In general, the EA should more fully address the issue of wetlands before concluding that no further analysis is needed.

Affected Environment, Special Status Species, Table 5, page 42

For bald eagle, place "Delisted" in the Federal Status column.

Affected Environment, Special Status Species, Kemp's ridley sea turtle, page 47

We suggest inserting a figure, similar to Figure 13, showing months of the year versus average number of nests.

Cumulative Effects

We recommend that the Cumulative Effects analysis be moved to a separate chapter after the Environmental Consequences chapter.

Environmental Consequences, Wildlife, Special Status Species, page 85

We suggest moving this detailed description of sea turtle nesting, egg removal procedures, and vehicle impacts to Chapter 3 so the public is aware of this information earlier in the document. Add language regarding the traffic management procedure when egg removal and hatchling release is taking place. Is traffic suspended or rerouted during these procedures to increase safety for park staff, visitors, and emerging juvenile turtles?

We appreciate the opportunity to provide comments on the DEA. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,



Rhonda Smith
Chief, Office of Planning and
Coordination